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Attorney for Defendant
Cody Cramer

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-155-JAM
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE AND EXCLUDE TIME
JOSHUA WILSON and) Date: February 8, 2022
CODY CRAMER,) Time: 9:30 a.m.
) Judge: Hon. John A. Mendez
<u>Defendants.</u>)

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for February 8, 2022 at 9:30 be continued to April 19, 2022, at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on February 8 at 9:30 a.m.
2. By stipulation, Mr. Cramer and Mr. Wilson now move to continue the status conference to April 19, 2022, at 9:30 a.m.
3. To date, the government has not produced discovery to the defendants. However, the government represents that it will discover photographs and reports to Mr.

1 Wilson and Mr. Cramer sometime in the next two weeks. The government also
2 intends to discover video evidence and the parties are currently discussing the
3 possibility of a protective order.

4 4. Mr. Cramer and Mr. Wilson require additional time to review the discovery,
5 investigate and research possible defenses, research potential pretrial motions, and
6 explore potential resolutions to the case, and otherwise prepare for trial.

7 5. Mr. Cramer and Mr. Wilson believe that failure to grant the requested continuance
8 would deny them the reasonable time necessary for effective preparation, taking
9 into account the exercise of due diligence.

10 6. Neither the government nor Mr. Wilson object to the continuance.

11 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
12 Act), the parties request that the time period between February 8, 2022 and April
13 19, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. §
14 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
15 granted by the Court at the defense's request, based on a finding that the ends of
16 justice served by granting the continuance outweighs the best interest of the
17 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: February 2, 2022

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

Date: February 2, 2022

/s/ Kyle R. Knapp
Kyle Knapp
Attorney for Mr. Cramer

Date: February 2, 2022

PHILLIP A. TALBERT
Acting United States Attorney

/s/ James R. Conolly
James R. Conolly
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: February 3, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

UNITED STATES DISTRICT COURT JUDGE